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CENTRIPETAL NETWORKS, LLC, STEVEN
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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ALBERT RICHARDS,

Plaintiff,

v.

CENTRIPETAL NETWORKS, LLC f/k/a
CENTRIPETAL NETWORKS, INC.;
STEVEN ROGERS; JONATHAN
ROGERS; and JOHN DOES 1-10,

Defendants.

Case No. 4:23-cv-00145-HSG

**STIPULATION TO EXTEND DEADLINE
TO TAKE DEPOSITION ORDER**

Local Civ. R. 6-1, 7-12

Judge: Hon. Haywood S. Gilliam, Jr.

Pursuant to Civil Local Rules 6-1 and 7-12, the Parties hereby stipulate to and respectfully request that the Court extend the deadline for the completion of depositions.

STIPULATION

WHEREAS, on August 15, 2024, the Court issued an order “permit[ting] Plaintiff to conduct the depositions of the witnesses Defendants have agreed to produce voluntarily” and ordered that “these depositions must be completed by September 6, 2024.” Dkt. 105 at 5.

WHEREAS, the Parties have met and conferred in good faith to promptly set the depositions of the witnesses Defendants have agreed to produce voluntarily, including Defendants Jonathan Rogers and Steven Rogers.

WHEREAS, the deposition of Jonathan Rogers, in his individual capacity and as a corporate representative, is scheduled for September 5, 2024.

WHEREAS, Steven Rogers, who is currently in France, is not available for a deposition by September 6, 2024.

WHEREAS, following discussions, the Parties have agreed that, with the Court’s permission, they would proceed with the deposition of Steven Rogers before September 20, 2024.

WHEREAS, the Parties respectfully submit that the requested relief would not unduly impact the Court’s case schedule.

THEREFORE, the Parties, through their counsel, hereby stipulate and respectfully request that the Court extend the deadline for the Parties to take depositions through September 20.

IT IS SO STIPULATED.

Dated: September 3, 2024

LEWIS & LLEWELLYN LLP

By: */s/ Peter C. Squeri*

Marc R. Lewis
Kenneth M. Walczak
Peter C. Squeri
Daniel Jordan

Attorneys for Plaintiff
ALBERT RICHARDS

1
2 Dated: September 3, 2024

KRAMER LEVIN NAFTALIS & FRANKEL
LLP

3 By: */s/ Jonathan M. Wagner*

4 Jonathan M. Wagner

5 Attorney for Defendants
6 CENTRIPETAL NETWORKS, LLC,
7 JONATHAN ROGERS, and STEVEN ROGERS

8 **SIGNATURE ATTESTATION**

9 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this
10 joint case management statement has been obtained from each signatory herein.

11 Dated: September 3, 2024

LEWIS & LLEWELLYN LLP

12 By: */s/ Peter C. Squeri*

13 Peter C. Squeri

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15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.** The Parties may take depositions
16 through September 20, 2024.

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20 Date: 9/4/2024



21 Hon. Haywood S. Gilliam, Jr.
22 United States District Judge
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